

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

CENGAGE LEARNING, INC.; BEDFORD,  
FREEMAN & WORTH PUBLISHING GROUP,  
LLC D/B/A MACMILLAN LEARNING;  
MACMILLAN HOLDINGS, LLC; ELSEVIER  
INC.; ELSEVIER B.V.; and MCGRAW HILL LLC,

Plaintiffs,

v.

GOOGLE LLC,

Defendant.

Case No. 1:24-cv-04274-JLR-BCM

**DECLARATION OF HOLLY K.  
VICTORSON IN SUPPORT OF MOTION  
TO ADMIT COUNSEL *PRO HAC VICE***

HOLLY K. VICTORSON, pursuant to 28 U.S.C. § 1746, declares under penalty of perjury as follows:

1. I am an associate at the law firm of Latham & Watkins LLP.
2. I submit this declaration in support of my Motion to Admit Counsel *pro hac vice* in the above-captioned matter.
3. I have been a member in good standing of the Bar of the State of California since December 3, 2015 and the Bar of the District of Columbia since March 20, 2019.
4. I attach Certificates of Good Standing from the State of California and the District of Columbia, which were issued within thirty days of this filing, as **Exhibit A** to my Motion to Admit Counsel *pro hac vice*.
5. I have never been convicted of a felony or been the subject of any criminal conviction.
6. I have never been censured, suspended, disbarred or denied admission or readmission by any court.
7. I have never been the subject of a disciplinary sanction and there are no disciplinary

proceedings presently pending against me.

Wherefore your declarant respectfully submits that she be permitted to appear as counsel *pro hac vice* in this one case on behalf of Defendant Google LLC.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: September 3, 2024

/s/ Holly K. Victorson  
Holly K. Victorson